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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

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In Re:	)	Case No.: 18-22394
Jamie W Maher and Tanya R Maher	)	
	)	Chapter 13
	)	
Debtor(s).	)	Judge Pamela S. Hollis (WILL)

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NOTICE OF MOTION

To: Glenn B. Stearns, Chapter 13 Trustee *notice via ECF delivery system*  
Jamie W Maher and Tanya R Maher, 2510 Lyman Loop Yorkville, IL 60560 *notice via US Mail*  
Gerald Hyundai, 209 Hansen BLVD., North Aurora, IL 60542 *notice via US Mail*  
McCalla Raymer Leibert Pierce, LLC, Toni Townsend, 1 North Dearborn  
Suite 1200, Chicago, IL 60611 *notice via US Mail*  
Sorman & Frankel, Ltd., Cari A Kauffman, 180 North LaSalle Street, Suite 2700  
Chicago, IL 60601 *notice via US Mail*

*See attached service list*

On August 9, 2019 at 10:45 a.m. or soon thereafter as I may be heard, I shall appear before Bankruptcy Judge A. Pamela S. Hollis or any other Bankruptcy Judge presiding at Joliet City Hall, 150 West Jefferson Street, 2<sup>nd</sup> Floor, Joliet, IL 60432, and shall present the **Motion to Obtain/Incur Debt**, at which time you may appear if so desired.

/s/ David H. Cutler  
David H. Cutler, esq.  
Attorney for Debtor(s)  
Cutler & Associates Ltd.  
4131 Main St.  
Skokie IL 60076  
(847) 673-8600

CERTIFICATE OF SERVICE

The undersigned, an Attorney, does hereby certify that a copy of this Notice and Motion was filed AND sent electronically and via US MAIL to the above captioned by 6:00 p.m. on or before July 26, 2019.

/s/ David H. Cutler  
Attorney for Debtor(s)

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MOTION TO OBTAIN/INCUR DEBT

NOW COMES the Debtors, Jamie W Maher and Tanya R Maher, by and through their attorneys, Cutler and Associates, Ltd., and moves this Honorable Court to enter an order authorizing the Debtors to obtain financing and incur debt for the purchase of a vehicle. In support thereof, the Debtors state as follows:

1. That on August 9, 2018 the Debtors filed for Chapter 13 protection.
2. That this Honorable court confirmed the Debtors plan on November 2, 2018.
3. The Confirmed Plan pays 100% to the general unsecured creditors and the payment is \$1,350.00 per month for 60 months.
4. That under the Confirmed Plan, the Debtors leased two vehicles, a 2016 Chevy Equinox and 2018 Chevy Silverado.
5. That the 2016 Chevy Equinox lease ended and the vehicle was returned three months prior to the filing of this motion.
6. That the Debtors only means of transportation is the 2018 Chevy Silverado.
7. That while the Debtors have attempted to manage having only one vehicle for them both to get to and from work and drop their daughter off at care and school it is no longer feasible and the Debtors require a second reliable and practical vehicle for means of transportation.

8. That the Debtors are in urgent need of the second vehicle.
9. That the Debtors found a used 2017 Hyundai Santa Fe Sport they would like to purchase.
10. That the Debtor's father, Raymond Ziegler is co signing on the loan to keep the payment and interest rate low.
11. The Debtors seek permission of this Honorable Court to incur this new debt that will result in them having monthly automobile installments of \$388.00 per month for 72 months at the 13.99% interest rate. (See Exhibit A)
12. That the terms in the aforementioned paragraph are the best terms the Debtors were able to obtain.
13. That the new vehicle payment is slightly lower than their previous vehicle payment for the leased 2016 Chevy Equinox which was turned in at the end of the lease agreement.
14. That the Debtors can afford this new debt, as they are both employed with new employers and their income since obtaining new positions in March has been steady.

WHEREFORE, the Debtors pray that this Court enter an order that will allow them to incur \$18,836.94 in auto financing with installment payments of \$388.00 per month for 72 months, at the 13.99% interest rate.

Respectfully submitted,

Jamie W Maher and Tanya R Maher

By: /s/ David H. Cutler  
David H. Cutler, esq.  
Cutler & Associates, Ltd.  
4131 Main St.  
Skokie IL 60076  
(847) 673-8600